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December 26, 2013

VIA ECF

The Hon. Sterling Johnson, Jr.
Senior United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Lebovits, et al.,
11 Crim. 134 (SJ-SMG)

Dear Judge Johnson:

My firm represents defendant Moses Neuman in the above-referenced matter. I write with the consent of the government to respectfully request additional time for the parties to file documents related to Mr. Neuman's sentencing and for an adjournment of the sentencing date.

The defendant is currently scheduled to be sentenced by the Court on January 9, 2014 at 9:30 a.m. There have been three previous requests for adjournments of the sentencing date as to Mr. Neuman, one by AUSA Charles Kleinberg, one by counsel for Yudah Neuman, and one by our firm, all of which were granted by Your Honor.

On December 18, 2013 the Court ordered the parties to submit all materials in aid of sentencing by December 30, 2013. I have spoken with AUSA Todd Kaminsky and he has informed me that the government requires an additional two weeks beyond the December 30, 2013 date for the submission of materials related to sentencing, including the government's objections to the PSR. Mr. Neuman consents to the government's requested extension of time and respectfully requests the same additional two weeks within which to submit materials in aid of sentencing.

Should the Court grant the request for additional time for the submission of sentencing materials, it will necessitate an adjournment of Mr. Neuman's sentencing date. Accordingly, we respectfully request that Your Honor adjourn the sentencing of Moses Neuman to one of the following dates:

- Friday, January 17, 2014 (am)
- Monday, January 20, 2014
- Tuesday, January 21, 2014

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I respectfully note that as I have a trial in Federal Court in North Carolina which begins in early-February, any sentencing date later than the week of January 20th will be extremely difficult for me.

As with my firm's previous request for an adjournment dated November 22, 2013, we respectfully request that Mr. Neuman be sentenced on a separate date from his codefendants due to the sensitive personal issues concerning family members, including children, which will be raised on behalf of Moses Neuman at his sentencing.

No further requests for adjournment of sentencing as to Mr. Neuman are anticipated.

Respectfully submitted,

S/S

Susan R. Necheles

cc: All Counsel (*via ECF*)